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September 14, 2009

VIA HAND DELIVERY

The Honorable James M. Peck
United States Bankruptcy Court for the
Southern District of New York
One Bowling Green
New York, NY 10004

Re: Motion to Compel Performance By Metavante

Dear Judge Peck:

We represent Lehman Brothers Special Financing and are in receipt of the letter from Bruce Arnold of Whyte Hirschboeck Dudek, counsel for Metavante Corporation, seeking a delay of the hearing set for tomorrow. We believe that the hearing should go forward as planned.

The parties fully briefed the issues underlying this motion. On July 14, 2009, the Court heard extensive argument on the motion to compel. Thus, Metavante has had two months to attempt to resolve this matter before this hearing. In this two month period, Metavante has not made a settlement proposal nor attempted in any way to settle the matter other than by asking us to make a settlement proposal (which LBSF did and to which Metavante has not responded). As far as LBSF can tell, Metavante's position is the same as it was on July 14, 2009. This is not a situation where the parties have been in active settlement discussions and it is reasonable that the parties may well settle the matter. In those circumstances we have not hesitated to move hearings to allow the parties time to finalize a settlement. Here, the parties are no closer to settling than they were at the hearing two months ago. Metavante's statement that it cannot make a settlement proposal until after a merger makes no sense and is unexplained.

Metavante also seeks a second bite at the apple by delaying ruling on this motion until the Court's consideration of a separate motion involving different counsel (Weil, Gotshal does not represent Lehman in connection with that motion). Given that

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this motion to compel Metavante has already been fully briefed and argued, there is no reason for further delay.

LBSF does not believe it is in the best interests of the estate to delay the Court's consideration and ruling on this matter any further. As this Court recognized at our last hearing, cash is the lifeblood of an estate and it is important that Metavante be required to begin complying with its obligations under its agreements with LBSF.

We would like to discuss the above with the Court either later this afternoon in a conference call or in Chambers at the Court's convenience tomorrow.

Sincerely,



Richard W. Slack

RWS:fr

cc: Bruce G. Arnold
Wilbur F. Foster, Jr.
Christopher J. Shore
Robert Lemons